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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AURORA ELEZI
OBO ADAM ELEZI,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Case No.: 2:24-CV-00509-CDS-BNW

**MOTION FOR EXTENSION OF TIME TO
FILE CERTIFIED ADMINISTRATIVE
RECORD AND ANSWER**

(FIRST REQUEST)

1 Defendant, Commissioner of Social Security (the “Commissioner”), by and through his
2 undersigned attorneys, respectfully requests that the Court extend the time for Defendant to file the
3 Certified Administrative Record (CAR). Pursuant to the Court’s order on April 30, 2024, the CAR is due
4 to be filed by May 7, 2024. Defendant requests the Court extend the time for filing by 21 days, through
5 and including May 27, 2024. This is the Commissioner’s first request for an extension of time.

6 Defendant submits that good cause exists for this extension request. The Office of Appellate
7 Operations (which prepares and certifies the certified administrative record) encountered a delay in
8 obtaining transcription of the administrative hearing. OAO has prioritized this case and expects to
9 complete preparation of the CAR as soon as the transcript is received. Though Defendant is requesting
10 an extension of 21 days, counsel will file the CAR as soon as possible after it is complete.

11 On May 3, 2024, the undersigned conferred with Plaintiff via email. Plaintiff indicated that she
12 opposes the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
14 through and including May 27, 2024.

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2 Dated: May 3, 2024

3 JASON M. FRIERSON
4 United States Attorney

5 /s/ Angela Thornton-Millard
6 ANGELA THORNTON-MILLARD
7 Special Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2024, I caused a copy of the foregoing document to be served upon a non-CM/ECF member, by United States mail or other carrier, at the address set forth below:

Aurora Elezi obo Adam Elezi
PO Box 363295
North Las Vegas, Nevada 89036

DATED: May 3, 2024

/s/ Angela Thornton-Millard
ANGELA THORNTON-MILLARD
Special Assistant United States Attorney

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**[PROPOSED] ORDER GRANTING
DEFENDANT'S MOTION FOR EXTENSION
OF TIME**

1 Based upon Defendant's Motion for Extension of Time, and for good cause shown, **IT IS**
2 **ORDERED** that Defendant file the Certified Administrative Record no later than May 27, 2024.
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6 IT IS SO ORDERED:

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9 UNITED STATES MAGISTRATE JUDGE

10 DATED: 5/7/2024
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